

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY Caption in Compliance with D.N.J. LBR 9004-1(b)	
<p>BROWN RUDNICK LLP Robert J. Stark, Esq. Kenneth J. Aulet, Esq. Bennett S. Silverberg, Esq. Seven Times Square New York, NY 10036 Telephone: (212) 209-4800 Fax: (212) 209-4801 Email: rstark@brownrudnick.com kaulet@brownrudnick.com bsilverberg@brownrudnick.com <i>Counsel for the Official Committee of Unsecured Creditors</i> -and- GENOVA BURNS LLC. Daniel M. Stolz, Esq. Donald W. Clarke, Esq. Gregory S. Kinoian, Esq. 110 Allen Rd., Suite 304 Basking Ridge, NJ 07920 Telephone: (973) 230-2095 Fax: (973) 533-1112 Email: DStolz@genovaburns.com DClarke@genovaburns.com GKinoian@genovaburns.com <i>Local Counsel for the Official Committee of Unsecured Creditors</i></p>	<p>BROWN RUDNICK LLP Stephen D. Palley, Esq. 601 Thirteenth Street, NW Washington, DC 20005 Telephone: (202) 536-1700 Fax: (202) 536-1701 Email: spalley@brownrudnick.com</p> <p>BROWN RUDNICK LLP One Financial Center Boston, MA 02111 Tristan Axelrod, Esq. Sharon I. Dwoskin, Esq. Telephone: (617) 856-8200 Fax: (617) 856-8201 Email: taxelrod@brownrudnick.com sdwoskin@brownrudnick.com</p>
<p>In re:</p> <p>BLOCKFI INC., et al.,</p> <p style="text-align: right;">Debtors.¹</p>	<p>Chapter 11</p> <p>Case No. 22-19361 (MBK)</p> <p>Jointly Administered</p>

¹ The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC. (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Debtors' service address is 100 Horizon Center Blvd., 1st and 2nd Floors, Hamilton, NJ 08691.

NOTICE OF CROSS-MOTION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR AN ORDER (A) APPOINTING A CHAPTER 11 TRUSTEE, (B) TERMINATING THE DEBTORS' EXCLUSIVITY PERIODS OR, ALTERNATIVELY, (C) CONVERTING THESE CASES TO CHAPTER 7 PROCEEDINGS, AND (D) FOR OTHER RELATED RELIEF

PLEASE TAKE NOTICE that the Official Committee of Unsecured Creditors (the “**Committee**”) in the above-captioned case of BlockFi, Inc. and its affiliated debtors (collectively, the “**Debtors**” or “**BlockFi**”), by and through the Committee’s counsel, shall cross-move (the “**Cross-Motion**”) before the Honorable Michael B. Kaplan, Chief United States Bankruptcy Judge for the United States Bankruptcy Court for the District of New Jersey, Trenton Vicinage, at the Clarkson S. Fisher U.S. Courthouse, located at 402 East State Street, Trenton, New Jersey 08608, in Courtroom No. 8, to the *Debtors’ Second Motion for Entry of an Order (I) Extending the Debtors’ Exclusive Periods to File a Chapter 11 Plan and Solicit Acceptances Thereof Pursuant to Section 1121 of the Bankruptcy Code and (II) Granting Related Relief* [Docket No. 886] (the “**Debtors’ Exclusivity Motion**”), which is currently scheduled to be heard on **July 13, 2023 at 10:00 a.m.** (prevailing Eastern Time)² (the “**Hearing Date**”).

PLEASE TAKE FURTHER NOTICE that, the Committee shall rely upon the combined *Objection of the Official Committee of Unsecured Creditors to Debtors’ Second Motion to Extend Exclusivity and Cross-Motion of the Official Committee of Unsecured Creditors for an Order (A) Appointing a Chapter 11 Trustee, (B) Terminating The Debtors’ Exclusivity Periods or, Alternatively, (C) Converting These Cases to Chapter 7 Proceedings, and (D) for Other Related*

² See Notice of Amended Disclosure Statement and Exclusivity Hearing Date and Objection Deadlines filed by the Debtors on June 17, 2023 [Docket No. 1089].

Relief (the “**Supporting Pleading**”) filed herewith in support of the relief sought by the Cross-Motion, and that no brief is being filed herewith since the legal basis upon which relief should be granted is set forth in the Supporting Pleading.

PLEASE TAKE FURTHER NOTICE that, oral argument is requested, unless the Court directs that no oral argument would be necessary.

PLEASE TAKE FURTHER NOTICE, that all objections, if any, must be made in accordance with the Local Rules of this Court which are located here: [Microsoft Word - Local Rules Package 8-1-21 final.docx \(uscourts.gov\)](#). In accordance with D.N.J. LBR 9013-2(a)(2), written objections to the Cross-Motion shall be filed with the Clerk of the United States Bankruptcy Court, for the District of New Jersey, Courthouse, 402 East State Street, Trenton, New Jersey 08608, and a copy thereof must simultaneously be served upon GENOVA BURNS, LLC., Attn: Daniel M. Stolz, Esq., 110 Allen Road, Suite 304, Basking Ridge, New Jersey 07920, so they are received by no later than seven (7) days before the Hearing Date.

PLEASE TAKE FURTHER NOTICE that in the absence of any objections, the relief requested hereunder may be granted without further notice.

Dated: June 27, 2023

GENOVA BURNS LLC

By: /s/ Gregory S. Kinoian

Daniel M. Stolz, Esq.

Donald W. Clarke, Esq.

Gregory S. Kinoian, Esq.

110 Allen Rd., Suite 304

Basking Ridge, NJ 07920

Tel: (973) 467-2700

Fax: (973) 467-8126

Email: DStolz@genovaburns.com

DClarke@genovaburns.com

GKinoian@genovaburns.com

Local Counsel for the Official

Committee of Talc Claimants